

PHASE I ENVIRONMENTAL SITE ASSESSMENT

CPQH PHASE VIII PARCEL AT STUART MESA MCB CAMP PENDLETON, CALIFORNIA

PREPARED FOR:

Camp Pendleton & Quantico Housing, LLC 139 Santa Rosa Drive Oceanside, CA 92058

PREPARED BY:

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InDepth performed a review of environmental documents and interviewed employees of the MCB Camp Pendleton Assistant Chief of Staff (AC/S) Environmental Security Department to evaluate historical Property use and adjoining property use. InDepth also obtained government environmental database reports and historical aerial photographs to determine if the Property, or nearby properties, are, or have been, the subject of past or present environmental investigations.

The Property and surrounding lands (formerly used for agricultural purposes and referred to as the ESM Ag Field) have undergone several rounds of environmental cleanup, mainly related to the historical legal application of pesticides. Cleanup actions across the former agricultural field and Property for chlorinated pesticides in soil have been completed by the DoN and documented in several closure reports from August 2011 to March 2015. Cleanup activities at the ESM Ag Field were performed in a phased cleanup and closure approach with the pesticide-impacted soil excavated and disposed offsite. The cleanup at the Property has achieved residential land use levels and received regulatory closure from the appropriate state agencies, with no land use limitations. Furthermore, the DON has determined that no further action is required to document the environmental condition of the property for its suitability for the real estate transaction proposed in the memorandum.

Isolated portions of the former Harry Singh and Son's farm maintenance area, located approximately 600 feet west of the northwestern portion of the Property, are within IR Site 1120. This IR site is the prior location of the farm maintenance facility and is currently in the Remedial Investigation phase for delineation of chlorinated pesticides, chlorinated herbicides, and petroleum hydrocarbons. Impacts to the Property from the IR Site have not been identified and the IR Site is located downgradient from the Property. Because this IR Site is downgradient from the Property, no environmental impacts are expected from the contamination at the IR Site.

In addition, the eucalyptus tree line area, located along the eastern boundary of the ESM Ag Field, and separated by the unpaved easement road from the Property covered under this Phase I ESA, is undergoing investigation and study by the DoN to further evaluate the extent and possible remediation of known pesticide contamination. This easement area, which is not part of the Property, was not included in prior DoN ESM Ag Field cleanup efforts and is currently being assessed.

As part of the performance of this Phase I, no data gaps were identified.

This Phase I ESA has not identified any evidence of current RECs, controlled RECs, historical RECs, or de minimis conditions in connection with the Property except for the following:

The Property is the location of a pesticide-impacted soil cleanup effort from prior use as an agricultural field. The clean-up actions for the Property are complete and regulatory closure was received from the RWQCB. No land use restrictions for the Property are required and the land was remediated to residential land use. Based upon the remediation efforts and regulatory status, the former pesticide impacted soil is considered a historical REC.



7.0 FINDINGS

7.1 HISTORICAL SITE ACTIVITIES

As part of the Phase I process, InDepth performed a site reconnaissance, reviewed available historical documents, and conducted interviews with Base individuals knowledgeable about the Property to determine if current or historical activities at the Property can be considered an environmental concern.

7.1.1 HISTORICAL DOCUMENT REVIEW/INTERVIEWS

Based on interviews and document review, the Property is the prior location of an environmental remediation effort for soil impacted with chlorinated pesticides from former use as an agricultural field.

InDepth reviewed the ECP and pertinent technical reports for the East Stuart Mesa soil remediation program site. According to the ECP, a voluntary cleanup was undertaken by the DoN in 2008 to address soil contamination from previous agricultural pesticide use. A preliminary screening for pesticides in soil was conducted by Shaw Environmental and Infrastructure, Inc. in 2008. Initial findings indicated elevated levels of toxaphene and dieldrin at 110 to 5,200 micrograms per kilogram (μ g/kg) and 2 to 90 μ g/kg, respectively. The remedial goal for toxaphene is 440 μ g/kg. The remedial goal for dieldrin is 24 μ g/kg. The decision was made to excavate the affected soil.

The Property and surrounding lands (formerly used for agricultural purposes and referred to as the ESM Ag Field) have undergone several rounds of environmental cleanup, mainly related to the historical legal application of pesticides. Cleanup actions across the former agricultural field and Property for chlorinated pesticides in soil have been completed by the DoN and documented in several closure reports from August 2011 to March 2015. Cleanup activities at the ESM Ag Field were performed in a phased cleanup and closure approach with the pesticide impacted soil excavated and disposed offsite. Documents prepared from the prior cleanup efforts and regulatory closure include:

- No Further Action, Stuart Mesa East Agricultural Field Phase VI, Camp Pendleton, CA, 17 November 2009 (Geotracker ID:T10000000991), documents the no further action (NFA) determination of the California Regional Water Quality Control Board, San Diego Region (RWQCB) relating to the soil excavation and confirmatory sampling for the 60-acre Phase VI Housing parcel, allowing for the initiation of housing construction activities.
- No Further Action, Stuart Mesa East Agricultural Field, Sewer Line and Four Delayed Conveyance Parcel, Camp Pendleton, CA, 11 May 2010 (Geotracker ID: T10000001660) documents the NFA determination of the RWQCB relating to a soil excavation and confirmatory



testing for the 14.3-acre cleaned portion of the ESM Ag Field located to the west and south of the existing Phase VI housing area and for the sewer utility line easement.

- No Further Action, Stuart Mesa East Agricultural Field, Phase VIIA and VIIB, Marine Corps Base Camp Pendleton, California, 10 March 2011 (Geotracker ID: T10000001528) documents the NFA determination of the RWQCB relating to a 221.9-acre cleaned portion of the ESM Ag Field occupying much of the agricultural field not documented in previous NFA letters.
- No Further Action, Stuart Mesa East Agricultural Field, Future Development Area, Marine Corps Base Camp Pendleton, California, 13 April 2012 (Geotracker ID: T10000002569) documents the completion of cleanup activities in the "Future Development Area", which includes the Property and several small areas in the south and western portions of the ESM Ag Field area.
- Memorandum for the Record, Environmental Condition of Property Update for Stuart Mesa Phase VIII Housing Area Lease Parcel, Marine Corp Base Camp Pendleton, California, 14 September 2015. The ECP Update Memorandum reviewed the prior documents prepared for the Property and surrounding area and determined that, based on the findings, no further action is required to document the environmental condition of the property for its suitability for the real estate transaction proposed in the memorandum.

The remediation efforts performed at the Property received NFA from the RWQCB and no additional clean-up efforts are anticipated or required. No land use restrictions for the Property are required and the land was remediated to residential land use standards. Based upon the remediation efforts and regulatory status, the former pesticide impacted soil is considered a Historical REC.

No additional MCB Camp Pendleton Installation Restoration Program (IRP) sites are located within the Property. However, isolated portions of the former East Stuart Mesa agricultural field are included in IR Site 1120. Off-site IRP, Solid Waste Management Unit (SWMU), and other Area of Concern (AOC) sites located near the housing areas are discussed in Section 7.2.1.

7.1.2 GOVERNMENT ENVIRONMENTAL RECORDS REVIEW

As detailed in Section 4, InDepth obtained and reviewed environmental databases and governmental records ("environmental records review") provided by EDR to characterize the obvious and apparent uses of the Property and surrounding properties.

The Property was listed in the DoD database. The DoD database indicates federally-owned land greater than 640 acres and does not reflect the environmental condition of the property. The Property was not listed in any other databases.

7.2 OFF-SITE ACTIVITIES

InDepth reviewed historical and regulatory documents relating to MCB Camp Pendleton and had an environmental records search conducted for properties surrounding the Property.